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November 18, 1995

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VIA FEDERAL EXPRESS

Joseph Cosentino, OSC
Removal Action Branch
Emergency and Remedial Response Division
U.S. Environmental Protection Agency
2890 Woodbridge Avenue
Edison, New Jersey 08837

Re: Bayonne Barrel & Drum Superfund Site

Dear Mr. Cosentino:

On behalf of Alpha Wire Corporation ("Alpha Wire"), this letter and enclosure respond to the request for information, dated September 28, 1995, directed to Alpha Wire by Ms. Kathleen C. Callahan. This response was originally due on October 30, 1995. However, pursuant to telephone conversations between this office, yourself, and Ms. Donna Murphy of your staff, the due date for the filing of this response was extended to November 20, 1995.

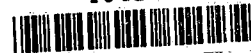
Should you have any questions, please do not hesitate to contact me.

Very truly yours,


Gail J. Howie

Enclosure

cc: Marc Seidenberg, Esq.



**ALPHA WIRE CORPORATION'S RESPONSES TO THE
USEPA'S CERCLA §104(e) REQUEST DATED SEPTEMBER 28, 1995**

GENERAL OBJECTIONS AND COMMENTS

1. Alpha Wire Corporation ("Alpha Wire" or the "Company") objects to the information request to the extent it is overly broad, or seeks ancient or otherwise irrelevant information, the production of which is unduly burdensome and the value of which is minimal given the United States Environmental Protection Agency's (the "Agency" or "USEPA") authority under CERCLA §104(e)(1) to obtain information only "for the purposes of determining the need for response, or choosing or taking any response action under this subchapter or otherwise enforcing the provisions of the subchapter".

2. Alpha Wire objects to the information request to the extent it requires production of information or documents which contain attorney work product or which are covered by the attorney-client privilege.

ALPHA WIRE'S RESPONSES

1. **General Information About the Company**

- a. State the correct legal name of the Company.

Alpha Wire Corporation

- b. Identify the legal status of the Company (corporation, partnership, sole proprietorship, specify if other) and the state in which the company was organized.

The Company is a Corporation organized pursuant to the laws of the State of New Jersey.

- c. State the name(s) and address(es) of the President and the Chairperson of the Board of the Company.

***Philip R. Cowen, President
711 Lidgerwood Avenue
Elizabeth, New Jersey 07207***

The Company has no Chairperson of the Board

- d. If the Company has subsidiaries or affiliates, or is a subsidiary of another organization, identify these related companies and state the name(s) and address(es) of the President(s) and the Chairperson(s) of the Board of those organizations. Provide such information for any further parent/subsidiary relationships.

The Company has the following subsidiaries:

- 1. Alpha Wire Limited (a Delaware Corporation)***
- 2. Alpha Wire Foreign Sales Corporation (a U.S. Virgin Islands Corporation)***

Philip R. Cowen is the President of each of these subsidiaries. Neither of these subsidiaries has a Chairperson of the Board.

- e. If the Company is a successor to, or has been succeeded by, another company, identify such other company and provide the same information requested above for the predecessor or successor company.

The Company is a successor to Alpha Holding Corporation (a Delaware Corporation), and Beacon Wire and Cable Company, Inc. (a New Jersey Corporation).

Philip R. Cowen was the President of Alpha Holding Corporation, and Beacon Wire and Cable Company, Inc. Neither of these predecessor companies had a Chairperson of the Board.

- f. If the Company transacted business with Bayonne Barrel & Drum in the name of an entity not disclosed above, give the name of such entity and state its relationship to the Company.

Based on the review of available records and after diligent inquiry, the Company has not discovered and is not aware of any information or documents which indicate, nor any person with knowledge, that it, any of its subsidiaries, predecessors, or other related entities transacted any business with Bayonne Barrel & Drum.

2. Company's Relationship to Bayonne Barrel & Drum

- a. State whether the Company or any Company facility transacted any business with Bayonne Barrel & Drum for the disposal, treatment, or storage of any barrels, drums, or other containers (hereinafter collectively referred to as "Containers").

- i. If so, describe the relationship (nature of services rendered or products sold to the Company) between the Company and Bayonne Barrel & Drum;

Based on the review of available records and after diligent inquiry, the Company has not discovered and is not aware of any information or documents which indicate, nor any person with knowledge, that it transacted any business with Bayonne Barrel & Drum for the disposal, treatment, or storage of any barrels, drums, or other containers.

- ii. Provide copies of any contracts or agreements between the Company and Bayonne Barrel & Drum;

After diligent inquiry, the Company has been unable to locate any documents which are responsive to this request.

- iii. For each such facility, state the nature of the operations conducted at the facility, including the time period in which the facility operated; and

See the Company's response to Request No. 2(a)(i).

- iv. For each such facility, state its name, address, and current RCRA Identification Number.

See the Company's response to Request No. 2(a)(i).

- b. In addition, if the Company transacted business with Bayonne Barrel & Drum, provide the following information for each transaction:

- i. Identify the specific dates of each transaction. Where an exact date cannot be provided for a transaction, provide an approximation by month and year;

Based on the review of available records and after diligent inquiry, the Company has not discovered and is not aware of any information or documents which indicate, nor any person with knowledge, that it transacted any business with Bayonne Barrel & Drum.

- ii. Identify the number of Containers that were the subject of each such transaction;

See the Company's response to Request No. 2(b)(i).

- iii. Generically describe each Container that was the subject of each such transaction (example: closed-head steel drums, etc.);

See the Company's response to Request No. 2(b)(i).

- iv. Identify the intended purpose of each such transaction;

See the Company's response to Request No. 2(b)(i).

- v. State whether each Container that was the subject of the transaction contained any substance at the time of the transaction. As to each Container that contained any substance:

- (1) Identify each such substance, including its chemical content, physical state, quantity by volume and weight, and other characteristics; and
- (2) Provide all written analyses that may have been made for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance;

See the Company's response to Request No. 2(b)(i).

- vi. If you contend that any such Container did not contain any substance at the time of the transaction:

- (1) State whether such Container had previously been used by the Company to contain any substance, and if so:
 - (a) Identify all substances previously contained within such Container, including its chemical content, physical state, and other characteristics; and
 - (b) Provide as to such substances, all written analyses that may have been made for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance;

See the Company's response to Request No. 2(b)(i).

- vii. Describe in detail any treatment of any Container that may have been performed by or on behalf of the Company prior to the time that the Container was transferred from the Company, including any process or procedure by which the Container was emptied or cleaned;

See the Company's response to Request No. 2(b)(i).

- viii. Provide copies of all documents relating in any way to each transaction, including copies of delivery receipts, invoices, or payment devices;

See the Company's response to Request No. 2(b)(i).

- ix. Identify all persons who might have knowledge of the transaction or who had any responsibility regarding the transaction; and

See the Company's response to Request No. 2(b)(i).

- x. If you sent any Container by means of any third party transporter, identify each such transporter, including the name and address of such transporter, and identify in which of the transactions such transporter acted.

See the Company's response to Request No. 2(b)(i).

3. Identify any other person (e.g., individual, company, partnership, etc.) having knowledge of facts relating to the questions which are the subject of this inquiry. For each such person that you identify, provide the name, address, and telephone number of that person, and the basis of your belief that he or she has such knowledge. For past and present employees, include their job title and a description of their responsibilities.

The Company objects to this request on the grounds that it is overly broad, unduly burdensome, and requires the identification of parties not known to the Company. Without waiving the foregoing objection, the Company states that based on the review of available records and after diligent inquiry, the Company has not discovered and is not aware of any information or documents which indicate, nor any individual with knowledge, that it transacted any business with Bayonne Barrel & Drum, and thus the Company is unaware of any person having knowledge of facts relating to the questions which are the subject of this inquiry.

4. Identify each person consulted in responding to these questions and correlate each person to the question on which he or she was consulted.

Attorneys at Lowenstein Sandler, including Linda Pickering, Neale R. Bedrock, and Gail J. Howie (65 Livingston Avenue, Roseland, New Jersey 07068) assisted in the preparation of these responses.

In addition, the following persons were involved in the inquiry regarding and responses to these requests:

*Christine Birkner, Vice President of Human Resources
Alpha Wire Corporation
711 Lidgerwood Avenue
Elizabeth, New Jersey 07207
(908) 925-8000*

*Duane Hoff, Industrial Engineer
Alpha Wire Corporation
711 Lidgerwood Avenue
Elizabeth, New Jersey 07207
(908) 925-8000*

*Steve Garvey, former Plant Engineering Manager
Can be contacted through Christine Birkner at the Company.*

5. Provide a list of all insurance policies and indemnification agreements held or entered into by you that may indemnify you against any liability that you may be found to have under CERCLA. Specify the insurer, type of policy, effective dates, and state per occurrence policy limits for each policy. Copies of policies may be provided in lieu of a narrative response. In response to this request, please provide not only those policies and agreements that are currently in effect, but also those in effect since your company began sending Containers to the Site.

The Company objects to this request on the grounds that based on the review of available records and after diligent inquiry, the Company has not discovered and is not aware of any information which connects it in any way to transactions with Bayonne Barrel & Drum, and thus it is unduly burdensome to require the Company to produce the insurance and indemnification information sought by this request. Should the Company be named as a potentially responsible party, the Company will respond to this request in an appropriate manner.

6. State whether there exists any agreement or contract (other than an insurance policy) which may indemnify the Company, present or past directors, officers or owners of shares in the Company, for any liability that may result under CERCLA. Provide a copy of any such agreement or contract. Identify any agreement or contract that you are unable to locate or obtain.

The Company objects to this request on the grounds that based on the review of available records and after diligent inquiry, the Company has not discovered and is not aware of any information which connects it in any way to transactions with Bayonne Barrel & Drum, and thus it is unduly burdensome to require the Company to produce the indemnification information sought by this request. Should the Company be named as a potentially responsible party, the Company will respond to this request in an appropriate manner.

7. Supply any additional information or documents that may be relevant or useful to identify other sources who disposed of or transported Containers to the Site.

The Company is not aware of any additional information relevant to the identification of other sources who disposed of or transported Containers to the Site.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of New Jersey
County of Union

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

William M. Mailer
NAME (print or type)

Vice President
TITLE (print or type)

William M. Mailer
SIGNATURE

Sworn to me before this 17th day
of November, 1995

Barbara Kinahan
Notary Public

BARBARA KINAHAN
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires August 17, 1997